

Joseph Barbieri – NJ Atty ID # 021332000  
Eric S. Latzer – NJ Atty ID # 023192011  
**COLE SCHOTZ P.C.**  
Court Plaza North  
25 Main Street  
P.O. Box 800  
Hackensack, New Jersey 07602-0800  
201-489-3000  
201-489-1536 Facsimile  
Attorneys for Defendant Able C&C Co. Ltd.

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

SEHOON CHANG,

Plaintiff,

v.

ABLE C&C CO. LTD.,

Defendant.

CIVIL ACTION NO. 2:23-cv-02590-KSH-  
JRA

**NOTICE OF MOTION TO DISQUALIFY  
PLAINTIFF'S COUNSEL, TO SANCTION  
PLAINTIFF AND HIS COUNSEL, AND  
FOR RELATED RELIEF**

**Motion Day: July 1, 2024  
Oral Argument Requested**

TO: Peter Y. Lee  
Lee LLC  
770 River Road  
PO Box 52  
Edgewater, NJ 07020-0052

**PLEASE TAKE NOTICE** that on July 1, 2024, or as soon thereafter as counsel may be heard, defendant Able C&C Co. Ltd. ("Defendant"), by and through its counsel, Cole Schotz P.C., shall move before the Honorable José R. Almonte, of the United States District Court for the District of New Jersey at the Frank R. Lautenberg U.S. Post Office & Courthouse Building, 2 Federal Square, Newark New Jersey 07102, for the entry of an Order (i) disqualifying Mr. Lee from serving as Chang's counsel in this case; (ii) allowing Able to conduct expedited discovery, including depositions of Chang and Mr. Lee, to determine the nature and extent of what privileged

and confidential documents may be in possession of Chang and Mr. Lee, and any third parties with whom they shared the documents; (iii) compelling Chang and Mr. Lee to immediately return, and to purge and permanently delete from all electronic devices, Able's privileged and confidential documents; (iv) compelling Chang and Mr. Lee and to submit declarations confirming that they have, in fact, turned over, and purged and permanently deleted, all such documents; (v) compelling Chang to permit a full forensic examination of all electronic devices owned or used by Chang; and (vi) sanctioning Chang and Mr. Lee for their misconduct.

**PLEASE TAKE FURTHER NOTICE** that the undersigned will rely upon the accompanying Memorandum of Law and Declaration of Eric Latzer in support of this motion. A proposed form of Order has also been submitted in support of this motion.

**PLEASE TAKE FURTHER NOTICE** that Defendant requests oral argument on this motion if timely opposition is filed.

Respectfully submitted,

COLE SCHOTZ P.C.  
Attorneys for Defendant Able C&C Co. Ltd.

By: /s/ Eric S. Latzer  
Eric S. Latzer

DATED: May 29, 2024